

1. The following were identified as all past owners, lease holders, or held easements and right of ways.

Owner	Ownership Period
Slick Oil Company	6/29/1914 – 4/11/1919
Bristow Oil and Refining Company	5/22/1915 -- 9/26/1915
C. D. Webster Oil Company	2/5/1915
Continental Refining Company	2/27/1915 – 5/24/1915
Standard Oil Company/BP	11/5/1915 – unknown
St. Louis-San Francisco Railway/BNSF	2/27/1917 – 2/25/1998
Wilcox Oil & Gas Company	1921 – 1963
Lorraine Petroleum Company	1923 – 1925
Interocean Oil Company	1925 – 1929
Ohio Oil/Marathon	1927 – 1938
Transcontinental Oil Company	1927 – 1930
Prairie Oil & Gas	1927 – 1929
Producers Oil Company	1929 – 1937
Sinclair OIL & Gas/Atlantic Richfield	1929 – unknown
Marathon Oil Company/Mid Kansas	1930 – 1931, 1935 – 1936
Illinois Pipe Line	1931 - 1935

The PRPs identified are the remaining active PRPs identified that owned or operated during the operational period of the Site.

Kinder Morgan
Marathon Oil Company
BNSF Railway Company
Sun Pipe Line Company
Sunoco, Inc.
BP Corporation North America
Atlantic Richfield

The Current Owners of the property are private citizens and include some residential homes and churches. The current owners are listed below.

Ex. 6 Personal Privacy (PP)

2. Special Notice issued to: Marathon Oil (SDMS 708674), BNSF (SDMS 9421390), Sunoco (SMDS 9421385), Sun Pipe Line (SDMS 9421388), BP Corporation (SDMS 9421386), and Atlantic Richfield Company (SDMS 9421392) on July 28, 2014.

Marathon Oil Company responded (SDMS 9526372) to the special notice letter (SNL) on September 12, 2014. Their response indicated that the information allegedly tying the company to the site was meager, and the information did not include evidence that the company operated the refinery.

BNSF responded (SDMS 712645) to the SNL on August 27, 2014. Their response indicated that a railroad right-of-way in the nature of an easement is not sufficient property interest to give rise to owner liability and that BNSF's operations on the Main line or the Spur do not implicate the company as a liable operator and declined to participate in negotiations.

Sunoco and Sun Pipe Line submitted a combined response (SDMS 713770) to the SNL on October 15, 2014. Both were unable to confirm their respective responsibility for the conditions at the Site and declined to participate in negotiations.

BP America responded (SDMS 712644) on behalf of Atlantic Richfield and BP Corporation on September 19, 2014. The response stated that the documents provided by the EPA did not suggest that Atlantic Richfield Company or BP had any connection to the Site that would lead it to enter into an Administrative Order of Consent. The response also indicated that the petroleum exclusion would appear to apply.

Based on extensive research, Enforcement believes that it is unlikely that the response will be PRP lead at this time.

Kinder Morgan, the successor to El Paso Energy Company (EPEC) and Tenneco, was the former owner/operator of the Site through merger. They were identified by the Oklahoma Department of Environmental Quality (ODEQ) and the EPA in 1994 Preliminary Assessment Report as a PRP (SDMS 901570). ODEQ did not approach Kinder Morgan to conduct remedial activities until October 31, 2011, in a letter requesting they participate in the voluntary clean-up program (SDMS 9515654). Kinder Morgan responded (SDMS 651569) to the ODEQ request on February 3, 2012. Its response explained the corporate relationship between Wilcox Oil, Tenneco, and El Paso Energy and the EPEC Oil Company Liquidating Trust. On December 18, 1998, EPEC was dissolved and the EPEC Oil Liquidating Trust was created on March 9, 2001. The Trust had a claims assertion date of December 18, 2008. The ODEQ request for Kinder Morgan to participate in a voluntary clean-up program was declined due to the request being made three years after the claims assertion date. The EPA requested and received the Liquidation Trust documents in a 104(e) request for information from Kinder Morgan. The Liquidation Trust documents were reviewed by Regional Counsel and it was concluded that the EPA could not pursue enforcement action.

An Enhanced Corporate and Operational History Report (SDMS 500001774) was completed on March 16, 2015. The report did not uncover any operational history or any additional information that would potentially encourage the recipients of the SNL to participate in RI/FS negotiations. Based on a review of the report by Regional Counsel and the Enforcement Section it was concluded that no further enforcement action would be beneficial.

The team has researched the “viability” of the Trust or the Agencies ability to tap into the trust. Enforcement efforts are ongoing to determine the possibility of receiving funds from the EPEC Oil Liquidating Trust.